

1 BLANK ROME LLP

2 Todd M. Malynn (SBN 181595)

[2 todd.malynn@blankrome.com](mailto:todd.malynn@blankrome.com)

3 Arash Beral (SBN 245219)

[3 arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)

4 Todd M. Malynn (SBN 181595)

[4 jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

5 2029 Century Park East | 6th Floor

6 Los Angeles, CA 90067

Telephone: 424.239.3400

Facsimile: 424.239.3434

7 Attorneys for Defendants, Counterclaimants, and

8 Third Party Plaintiffs PCJV USA, LLC, PCI

9 TRADING LLC, POTATO CORNER LA

10 GROUP, LLC, GK CAPITAL GROUP, LLC,

11 NKM CAPITAL GROUP, LLC and GUY

12 KOREN, and Defendants J & K AMERICANA,

13 LLC, J&K LAKEWOOD, LLC, J&K

14 OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J

15 & K ONTARIO, LLC, J&K PC TRUCKS, LLC,

16 HLK MILPITAS, LLC, and GK CERRITOS, LLC

17

18 UNITED STATES DISTRICT COURT**19 CENTRAL DISTRICT OF CALIFORNIA**

20 15 SHAKEY'S PIZZA ASIA VENTURES,
16 INC, a Philippines corporation,

21 Plaintiff,

22 vs.

23 19 PCJV USA, LLC, a Delaware limited
24 liability company; PCI TRADING , LLC, a
25 Delaware limited liability company; GUY
26 KOREN, an individual; POTATO CORNER
27 LA GROUP, LLC, a California limited
28 liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**DECLARATION OF ALON
KOREN**

Complaint Filed: May 31, 2024

Trial Date: September 26,
2025

1 limited liability company and DOES 1
2 through 100, inclusive,

3 Defendants.

4 PCJV USA, LLC, a Delaware limited
5 liability company; PCI TRADING LLC, a
6 Delaware limited liability company;
7 POTATO CORNER LA GROUP LLC, a
8 California limited liability company; GK
9 CAPITAL GROUP, LLC, a California
10 limited liability company; NKM CAPITAL
11 GROUP LLC, a California limited liability
12 company; and GUY KOREN, an individual,

13 Counter-Claimants,

14 v.

15 SHAKEY'S PIZZA ASIA VENTURES,
16 INC, a Philippines corporation,

17 Counter Defendant.

18 PCJV USA, LLC, a Delaware limited
19 liability company; PCI TRADING LLC, a
20 Delaware limited liability company;
21 POTATO CORNER LA GROUP LLC, a
22 California limited liability company; GK
23 CAPITAL GROUP, LLC, a California
24 limited liability company; NKM CAPITAL
25 GROUP LLC, a California limited liability
26 company; and GUY KOREN, an individual,

27 Third Party Plaintiffs,

28 v.

29 PC INTERNATIONAL PTE LTD., a
30 Singapore business entity; SPAVI
31 INTERNATIONAL USA, INC., a California
32 corporation; CINCO CORPORATION, a
33 Philippines corporation; and ROES 1 through
34 10, inclusive,

35 Third Party Defendants.

DECLARATION OF ALON KOREN

I, Alon Koren, declare as follows:

1. I am over 18 years old. The facts stated here are based on my personal knowledge, my work for PCJV USA, LLC (“PCJV”) and PCI Trading LLC (“PCI Trading”), and my review of files and business records maintained in the ordinary course of PCJV’s and PCI Trading’s business. If called, I could and would testify competently thereto.

2. I have worked with Potato Corner USA for years, including through PCJV and PCI Trading, and I am familiar with the parties and entities referenced in this litigation, including Shakey's Pizza Asia Ventures, Inc. ("SPA VI").

3. I am also familiar with Highfive Corporation through my direct experience in dealing with Ms. Catherine Antonio. At Dkt. 37-3-37-6, I previously filed a declaration with exhibits containing certain of my communications with Ms. Antonio. For years, I placed orders for supplies with Ms. Antonio, who I understood to be employed by Highfive Corporation. At some point after SPAVI's public announcement of its acquisition, Ms. Antonio continued to handle our orders but through a SPAVI email address (cmantonio@shakeys.biz) and a SPAVI email signature. *See, e.g.*, Dkt 37-5. I thus understood her to be working for or on behalf of SPAVI. Based on this transition and my ongoing dealings with Ms. Antonio in her new capacity, I believe that SPAVI acquired Highfive Corporation or its relevant operations given the continuity of her role in handling our supply orders both before and after SPAVI's acquisition.

I declare under penalty of perjury that the foregoing is true and correct.
Executed September 24, 2025, within the United States, its territories, possessions,
or commonwealths. 

Alon Koren

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28